

IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT  
IN AND FOR MANATEE COUNTY, FLORIDA  
CIVIL DIVISION

MARY LOU SMITH, an individual,  
and SHARON DENSON, an individual,

Plaintiffs,

vs.

CASE NO. 2008 CA 11315

TRAILER ESTATES PARK AND  
RECREATION DISTRICT,  
an independent special taxing district,  
JANET JONES, an individual,  
JOHN VANDER MOLEN, an individual,  
JOSEPH SALERNO, an individual, and  
MARY LOU McNULTY, an individual,

Defendants.

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**DEFENDANT, TRAILER ESTATES PARK AND RECREATION  
DISTRICT'S SUPPLEMENTAL WITNESS AND EXHIBIT LIST**

Defendant, TRAILER ESTATES PARK AND RECREATION DISTRICT, by and through its undersigned attorneys, files this, its Supplemental Exhibit List, for the trial of this cause, as follows:

**WITNESSES**

1. Martha Brauer, c/o Thomas D. Shults, Esquire, Kirk-Pinkerton, P.A., 50 Central Avenue, Suite 700, Sarasota, Florida 34236.  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
2. Representative for Trailer Estates Park and Recreation District, c/o Thomas D. Shults, Esquire, Kirk-Pinkerton, P.A., 50 Central Avenue, Suite 700, Sarasota, Florida 34236  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
3. Janet Jones, c/o Hunter W. Carroll, Esquire, Matthews, Eastmoore, et al., 1777 Main Street, Suite 500, Sarasota, Florida 34236  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.

4. John Vander Molen, c/o Daniel E. Scott, Esquire, Daniel E. Scott, P.A., 2033 Main Street, Suite 408, Sarasota, Florida 34237  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
5. Joseph Salerno, c/o Robert E. Turffs, Esquire, Robert E. Turffs, P.A., 1444 First Street, Suite B, Sarasota, Florida 34236  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
6. Mary Lou McNulty, c/o James D. Dye, Esquire, Dye, Deitrich, Ptruff & St. Paul, P.L., 1111 Third Avenue West, Suite 300, Bradenton, Florida 34205  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
7. Mary Lou Smith, c/o Lewis, Longman & Walker, P.A., 1001 Third Avenue West, Suite 670, Bradenton, Florida 34205  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
8. Sharon Denson, c/o Lewis, Longman & Walker, P.A., 1001 Third Avenue West, Suite 670, Bradenton, Florida 34205  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
9. Mark P. Barnebey, Kirk Pinkerton, P.A., 1301 6<sup>th</sup> Avenue West, Suite 401, Bradenton, Florida 34205  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
10. Scott Rudacille, Kirk Pinkerton, P.A., 1301 6<sup>th</sup> Avenue West, Suite 401, Bradenton, Florida 34205  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
11. Jason T. Gaskill, Esquire, Ruden McClosky, et al., 1515 Ringling Blvd., Suite 700, Sarasota, Florida 34236  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
12. Louis M. Ursini, III, Ruden McClosky, et al., 1515 Ringling Blvd., Suite 700, Sarasota, Florida 34236  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.

13. Gail Opper, 1915 Minnesota Avenue, Bradenton, Florida 34207  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
14. Jennifer R. Cowan, Lewis, Longman & Walker, P.A., 1001 Third Avenue West, Suite 670, Bradenton, Florida 34205.  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
15. T.J. Miller, 1903 69<sup>th</sup> Avenue West, Bradenton, Florida 34281-6298.  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
16. Joe Fulmer, 2317 Pennsylvania Avenue, Trailer Estates, Bradenton, Florida 34207  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
17. Peggy Durham, Post Office Box 6273, Bradenton, Florida 34281-6273  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
18. Margo Cushman, 2004 Florida Boulevard, Trailer Estates, Bradenton, Florida 34207  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
19. Mike Neal, 6619 California Street, Trailer Estates, Bradenton, Florida 34207  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
20. Joe Bigley, 1905 Illinois Avenue, Trailer Estates, Bradenton, Florida 34207  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
21. Robert Poor, 1818 Manatee Avenue West, Bradenton, Florida 34205  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
22. Jim Angerame, 1614 Minnesota Avenue, Trailer Estates, Bradenton, Florida 34207  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
23. Lucille Donovan, 2307 Pennsylvania Avenue, Trailer Estates, Bradenton, Florida  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
24. Larry Sarhatt, 6620 Connecticut Avenue, Trailer Estates, Bradenton, Florida 34207

- Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
25. Phyllis Hamblen, 6716 Marina Drive, Trailer Estates, Bradenton, Florida 34207  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
  26. Lenora Neal, 6619 California Street, Trailer Estates, Bradenton, Florida 34207  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
  27. Sadie Beasley, 6917 E. Bayou, Trailer Estates, Bradenton, Florida 34207  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
  28. Lonny Stanley, 6620 New Jersey Street, Trailer Estates, Bradenton, Florida 34207  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
  29. Virgil Reinig, 2113 Minnesota Avenue, Trailer Estates, Bradenton, Florida 34207  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
  30. Joe Langton, 2107 Ohio Avenue, Trailer Estates, Bradenton, Florida 34207  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
  31. Emma Tuttle, 6623 Oregon, Trailer Estates, Bradenton, Florida 34207  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
  32. Bill Mumford, 1715 Iowa, Trailer Estates, Bradenton, Florida 34207  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
  33. Attorney's Fees Expert to be designated.  
Will testify regarding Plaintiffs' and Defendants' attorney's fees.
  34. Records Custodian for Lewis, Longman & Walker, P.A., 1001 Third Avenue West, Suite 670, Bradenton, Florida 34205.  
Will testify regarding Sunshine Law and Public Records Law and concerning the various facts of underlying claims of Plaintiffs and defenses of Defendants.
  35. John Jorgensen, Sylint Group, 240 N. Washington Boulevard, Suite 240, Sarasota, Florida 34236  
Expert witness for rebuttal to the extent Plaintiffs present expert computer testimony.

36. Bob Sweat, Manatee County Supervisor of Elections or Records Custodian for Manatee County Supervisor of Elections, 600 301 Boulevard West, Suite 108, Bradenton, Florida 34205  
Will testify regarding the results of the Trailer Estate elections of the Trustees from 2005 to the present.
37. All persons deposed in this lawsuit.
38. All witnesses listed on any other parties' Witness List.
39. All witnesses necessary for impeachment or rebuttal.

Discovery is ongoing; therefore Defendant reserves the right to supplement this witness list.

### EXHIBITS

1. Exhibit One of the deposition of Sharon Denson - Amended Complaint dated April 12, 2009, including attached exhibits.
2. Exhibit Two of the deposition of Sharon Denson – Amended Interrogatory Answers.
3. Exhibit Three of the deposition of Sharon Denson - Affidavit of Sharon Denson.
4. Exhibit Six of the deposition of Sharon Denson – Copy of e-mail dated October 7, 2006.
5. Exhibit Seven of the deposition of Sharon Denson – Copy of e-mail dated October 9, 2006.
6. Exhibit Eight of the deposition of Sharon Denson - Copy of e-mail dated August 32, 2006.
7. Exhibit Nine of the deposition of Sharon Denson - Copy of e-mail (2) dated March 9, 2007 and March 8, 2007.
8. Exhibit Ten of the deposition of Sharon Denson - Copy of e-mail dated April , 2007.
9. Exhibit Eleven of the deposition of Sharon Denson - Copy of e-mail dated April 11, 2007.
10. Exhibit Twelve of the deposition of Sharon Denson - Copy of e-mail dated April 15, 2007.
11. Exhibit Thirteen of the deposition of Sharon Denson - Copy of e-mail dated May 6, 2007.

12. Exhibit Fourteen of the deposition of Sharon Denson - Letter to C.E.R.T. from Denson dated August 11, 2008.
13. Exhibit Fifteen of the deposition of Sharon Denson – Copy of photos (2) of VHS tapes.
14. Exhibit Sixteen of the deposition of Sharon Denson – Copy of videotape label.
15. Video – Trustee Meeting (Budget Proposed) dated February 20, 2006.
16. Exhibit Eighteen of the deposition of Sharon Denson – Document from “Concern citizens of Trailer Estates”.
17. Exhibit Nineteen of the deposition of Sharon Denson - Notice of Litigation Assessment Session.
18. Exhibit 2 of deposition of TJ Miller - Memo 3/18/08 from John Vander Molen re: Trustees & Employee phone numbers.
19. Exhibit 3 of deposition of TJ Miller - Letter 12/12/08 from Jennifer Cowan to Barnebey/Miller.
20. Exhibit 4 of deposition of TJ Miller - Memo 3/14/08 from TJ Miller to Jones/Vander Molen/Smith.
21. Exhibit 5 of deposition of TJ Miller - Public records policy and procedure.
22. Exhibit 6 of deposition of TJ Miller - Fee schedule 3/18/08.
23. Exhibit 7 of deposition of TJ Miller - Letter 7/3/06 from Mary Lou McNulty to Mary Lou Smith.
24. Exhibit 8 of deposition of TJ Miller - Letters 8/27/06 and 8/11/06 from Mary Lou Smith to Trailer Estates Park.
25. Exhibit 9 of deposition of TJ Miller - Fax 4/23/08 from TJ Miller to Mark Barnebey w/attached database sample.
26. Exhibit 11 of deposition of TJ Miller - Letter 3/12/09 from Jennifer Cowan to Barnebey/Miller.
27. Exhibit 12 of deposition of TJ Miller - Typed notes 5/8/07 from Janet Jones to TJ Miller.
28. Exhibit 13 of deposition of TJ Miller - Minutes of Board of Trustee Meeting 5/21/07.

29. Exhibit Two of the deposition of Beverly Lew - Affidavit of Beverly Lew.
30. Exhibit Three of the deposition of Beverly Lew - Copy of receipt dated April 29, 2009.
31. Exhibit 1 of the deposition of John Vander Molen – Draft of organizational chart dated November 14, 2008.
32. Exhibit 5 of the deposition of John Vander Molen - Procedure for VHS Tapes or videos of Board of Trustee Meetings.
33. Exhibit 6 of the deposition of John Vander Molen - Public records policy and procedure.
34. Exhibit 8 of the deposition of John Vander Molen - Letter dated May 29, 2008.
35. Exhibit 13 of the deposition of John Vander Molen - Budget Questionnaire – December 2008.
36. Exhibit One of the deposition of Pamela Cole -- Duties of the Treasurer Amended 1/96.
37. Exhibit Two of the deposition of Pamela Cole -- Duties of the Treasurer Revised 11/17/08; 1/19/09.
38. Exhibit Three of the deposition of Pamela Cole -- Copy of e-mail from Cole to Miller dated September 15, 2007.
39. Exhibit Four of the deposition of Pamela Cole -- Memo from Cole dated September 12, 2007.
40. Exhibit Five of the deposition of Pamela Cole -- Copy of journal kept by Cole.
41. Exhibit Six of the deposition of Pamela Cole -- Memo to Cole from Jones dated August 30, 2007.
42. Exhibit Two of the deposition of Judy Riedel - Copy of e-mail dated 1/9/2009.
43. Exhibit Three of the deposition of Judy Riedel – Affidavit of Judy Riedel.
44. Exhibit Two of the deposition of Jennifer Cowan – Affidavit of Jennifer Cowan.
45. Exhibit Three of the deposition of Jennifer Cowan - Letter dated April 10, 2009, with attached Public Records Requests.

46. Exhibit Four of the deposition of Jennifer Cowan - Public Records Request dated April 30, 2009.
47. Exhibit One of the deposition of Martha Brauer -- Portion of Trailer Estates Bylaws Re: Administrative Committee
48. Exhibit Two of the deposition of Martha Brauer -- Draft Organizational Chart.
49. Exhibit Three of the deposition of Martha Brauer - Organizational Chart.
50. All PP34 agenda item forms completed and submitted, including supplemental materials from January 1, 2005 to the present.
51. Video - Board Meeting Workshop 12/14/06 & 12/18
52. Video - Board Workshop 12/27/06
53. Video - 1/15/07 Board Meeting  
1/22/07 Workshop (sunshine law)
54. Video - Board Meeting Part One 2/5/07
55. Video - Budget Workshop 2/12/07  
Board Meeting 2/19/07
56. Video - 2/26/07 Board Workshop (budget)
57. Video - 3/5/07 Budget Meeting
58. Video - 3/12/07 Board Workshop
59. Video - 3/19/07 Board Meeting – Women Speaks re: Taking Back
60. Video - Second Half of Board Meeting 4/2/07  
(Lawer [sic] Statement on Posting Meetings)
61. Video - Board Workshop 4/9/07
62. Video - Board Meeting 4/16/07 Appointment to Fill – Vacant Seat (Vander Molen)
63. Video - TE Board MTG 5/7/07
64. Video - TE Board Meeting 10/1/07
65. Video - TE Board Workshop 10/8/07

66. Video - TE Workshop FASD 10/8/07 RANTS & RAVES
67. Video - 10/15/07 Board Meeting
68. Video - 11/5/07 Board Meeting FASD
69. Video - Board Workshop 11/12/07
70. Video - Board Meeting 11/19/07
71. Video - Board Meeting 12/3/07 (MLS Decision by Board)  
Workshop 12/01/07
72. Video - Board Meeting 12/17/07 JV & MLM passing notes  
Board Meeting 1/2/08 Election of Officers
73. Video - Board Candidate Night 2007
74. Video - 1/7/08 Board Meeting Public Records – policy accepted  
1/14/08 Workshop (website) 1/21/08 Board Meeting  
(Joe Salerno 50/50)
75. Video - 1/28/08 Board Workshop (policy discussion)  
2/4/08 Board Meeting (adopt policies)  
2/11/08 Board Workshop (marina name policy discussion)
76. Video - 2/18/08 Board Meeting (Gail Opper)  
2/25/08 Board Meeting (budget)
77. Video - 3/9/08 Workshop
78. Video - 3/13/08 Board Meeting (Opper statement/sunshine)  
3/10/08 Board Workshop (Budget) (JJ litigation)
79. Video - Board Meeting 3/17/08 (laptop computer)  
Board Workshop 3/24/08 (disaster plan)
80. Video - 3/31/08 Board Workshop (Policy & Procedure)
81. Video - 4/7/08 Board Meeting (Golf Cart)  
4/14/08 Board Workshop  
4/21/08 Board Meeting (Opper letter)
82. Video - Board Meeting 10/6/08 John Janet Sunshine?  
MLM attack Chet  
Board Meeting 10/20/08 11/3/08

83. Video - Board Workshop 10/22/08
84. Video - 11/10/08 Board Workshop (policys & procedures)
85. Video - 11/17/08 Board Meeting – Policy & Procedures Pass  
12/1/08 Inter Office Memo  
12/8/08 Board Workshop
86. Video - 12/15/08 Board Meeting (McNulty – disband standing committee)  
1/2/09 Swear In  
1/5/09 First part OK Board Meeting
87. Video - 1/5/09 (Extra Tape) Board Meeting
88. Video - 1/5/09 Reconvene Board Meeting
89. Video - 1/12/09 Board Meeting
90. Video - (Extra copie) [sic] 1/12/09 Board Workshop
91. Video - 1/19/09 Board Meeting - dismiss standing committee  
2/2/09 Board Meeting
92. Video - Shun residents Harry Fitzpatrick  
TE Board Meeting 2/2/09
93. Video - 1/26/09 Workshop Sunshine Law
94. Video - 2/9/09 Board Workshop Marina & Storage lot Complete Meeting
95. Video - 2/16/09 Board Meeting Lawyer Explains Mediation Harry Kilpatric [sic]  
resigns
96. Video - 2/23/09 Board Workshop
97. Video - 3/16/09 appaentmen [this was illegible] & Budget
98. Video - Continued to Monday 3/9/09  
Budget Meeting Monday 3/2/09 (night)
99. Plaintiffs' Answers to Interrogatories.
100. Trailer Estates Park and Recreation District Policy and Procedures Manual.
101. Trailer Estates Park and Recreation District Bylaws.

102. Trailer Estate Park and Recreation District Charter.
103. All Trailer Estate Park and Recreation District meeting notices from January 1, 2004 to the present.
104. Trailer Estate Park and Recreation District Workshop minutes from January 1, 2004 to the present.
105. Trailer Estates Park and Recreation District Board Agenda Item Form/Policy.
106. Letter from Mary Lou Smith to Trailer Estates/Attn: Mary Lou McNulty dated August 27, 2006.
107. E-mails between Scott Rudacille and Jennifer Cowan dated March 25, 2009.
108. Letter from Sharon Denson to Mary Lou McNulty dated April 11, 2008.
109. Letter from Sharon Denson to Mary Lou McNulty dated April 17, 2008.
110. Letter from Sharon Denson to TJ Miller dated November 24, 2008.
111. Letter from Sharon Denson to TJ Miller dated November 26, 2008.
112. Letter from Mary Lou Smith to Trailer Estates Park and Recreation District Board of Trustees dated April 17, 2006.
113. Letter from Mary Lou Smith to Trailer Estates Park and Recreation District, Attn: Mrs. McNulty dated May 23, 2006.
114. Letter from Mary Lou Smith to Trailer Estates Park and Recreation District, Attn: Mrs. McNulty dated June 22, 2006.
115. Letter from Mary Lou Smith to Mr. and Mrs. Opper dated March 11, 2008.
116. Letter from Louis M. Ursini, III, Ruden McClosky to Mary Lou McNulty dated May 18, 2006.
117. Memorandum from Jason T. Gaskill to FILE – Client File/Matter No. 23474-0056 dated May 10, 2006.
118. Letter from Jennifer R. Cowan to Mark P. Barnebey and TJ Miller dated January 8, 2009.
119. Letter from Jennifer R. Cowan to Mark P. Barnebey dated February 4, 2009.

120. Letter from Mary Lou McNulty to Mary Lou Smith dated August 22, 2006.
121. Letter from Jennifer Cowan to Mark Barnebey dated August 17, 2007.
122. All public records requests of the plaintiffs or their attorneys.
123. Minutes of the Trailer Estates Park and Recreation District Board of Trustees Regular Meetings from January 1, 2004 through the present.
124. Recordings of the Trailer Estates Park and Recreation District Board of Trustees Regular Meetings from January 1, 2004 through the present.
125. Any and all audio cassette tapes of Trailer Estates Park and Recreation District Committee meetings.
126. Database of Trailer Estates Park and Recreation District.
127. "An Open Letter to Trailer Estates Residents" by Mary Lou Smith dated October 16, 2006.
128. Letter from Maggie D. Mooney to Scott E Rudacille dated May 8, 2007.
129. Minutes and recordings of the June 19, 2006 Board of Trustees meeting.
130. Minutes and recordings of the September 5, 2006 Board of Trustees meeting.
131. Comments/entries made by the plaintiffs, among others, who posted to the Editor's Blog at <http://bradentonherald.blogspot.com/2008/04/trailer-estates-stories-are-about-law.html>.
132. Comments/entries made by the plaintiffs, among others, who posted to <http://trailerestatesflorida.com>.
133. Comments/entries made by the plaintiffs, among others, who posted to <http://bradenton.com/new/story/1539864.html>.
134. Comments/entries made by the plaintiffs, among others, who posted to the Trailer Estates Yahoo Group.
135. Comments/entries made by the plaintiffs, among others, who posted to <http://www.trailerestates.org>.
136. Copy of e-mail of Beverly Lew dated September 6, 2007
137. Copy of e-mail of Tom Featheringill dated September 6, 2007

138. Notice of Publication of 2008 -- 2009 Trustee meeting dates/Affidavit of Publication.
139. TJ Miller Certificate of Completion of Records Management 2007 seminar.
140. Copy of e-mail from Tom Featheringill to Sharon Denson dated August 18, 2007.
141. Copy of e-mail from Mary Lou Smith to Tom Featheringill dated September 18, 2006.
142. Copy of e-mail from Tom Featheringill to Mary Lou Smith dated September 18, 2007.
143. Copy of e-mail from Tom Featheringill to Mary Lou Smith dated August 6, 2007.
144. Copy of e-mail from Tom Featheringill to Mary Lou Smith dated February 4, 2007.
145. Letter from Mary Lou Smith to Mrs. McNulty dated August 27, 2006.
146. Letter from Mary Lou Smith to Ron Getman/Board of County Commissioners dated August 10, 2006.
147. Letter from Mary Lou Smith to Mrs. McNulty dated November 10, 2006.
148. Copy of presentation of Mary Lou Smith dated January 16, 2007.
149. Copy of e-mail from Mary Lou Smith to Trailer Estates Yahoo Groups dated November 12, 2007.
150. Letter from Mary Lou Smith to Peg Durham dated October 25, 2006.
151. Memo of Mary Lou Smith dated February 20, 2009.
152. Letter from Mary Lou Smith to Ron Getman/Board of County Commissioners dated February 17, 2007.
153. Letter from Sharon Denson to Board of Trustees dated March 12, 2007.
154. Copy of e-mail from Sharon Denson to Mary Lou Smith dated October 7, 2006.
155. Copy of e-mail from Sharon Denson to Mary Lou Smith dated October 9, 2006.
156. Copy of memo of Sharon Denson dated October 9, 2006.
157. Copy of e-mail from Sharon Denson to Mary Lou Smith dated March 9, 2007.
158. Copy of e-mail from Sharon Denson to Mary Lou Smith dated May 6, 2007.

159. Copy of e-mail string Maggie Mooney to Mary Lou Smith dated August 20, 2007.
160. Copy of e-mail from Sharon Denson to Mary Lou Smith dated dated April 15, 2007.
161. Notice of Special Meeting Friday, December 29, 2006.
162. Letter from Peg Durham to Sharon Denson dated December 19, 2006.
163. Letter from Sharon Denson to Board of Trustees dated December 5, 2006.
164. "Sharon Denson for Trustee" flyer/ad in Tribune November 2007.
165. Notice of Public Hearing for March 28, 2007.
166. Letter from Board of Trustees to residents dated April 1, 2006
167. Trailer Estates rates sheet for storage lots and boat slips.
168. Letter from Louis Ursini to Mary Lou McNulty dated October 27, 2006.
169. Manatee County Code Enforcement Officer notes regarding 11/05 code enforcement of 1613 Illinois, CAC update and resolution document.
170. Ethics Commission complaint and response.
171. Procedure for Interview for Trustee Appointments to the Board of Trustees.
172. Letter from Mary Lou McNulty to Mary Lou Smith dated May 19, 2006.
173. Procedures for Deed Restriction Violations for Yards and Lots.
174. Commentary of Mary Lou Smith to community survey.
175. Records Management Compliance Statements, 2005-2006.
176. Records Management Compliance Statements, 2006-2007.
177. Records Management Compliance Statements, 2007-2008.
178. Minutes and recording of November 15, 2004 Board Meeting.
179. Minutes and recording of September 20, 2004 Board Meeting.
180. Minutes and recording of September 7, 2004 Board Meeting.

181. Minutes and recording of August 16, 2004 Board Meeting.
182. Minutes and recording of August 2, 2004 Board Meeting.
183. Minutes and recording of July 19, 2004 Board Meeting.
184. Minutes and recording of June 21, 2004 Board Meeting.
185. Minutes and recording of June 7, 2004 Board Meeting.
186. Minutes and recording of May 17, 2004 Board Meeting.
187. Minutes and recording of May 3, 2004 Board Meeting.
188. Minutes and recording of April 19, 2004 Board Meeting.
189. Minutes and recording of April 5, 2004 Board Meeting.
190. Minutes and recording of March 15, 2004 Board Meeting.
191. Minutes and recording of March 1, 2004 Board Meeting.
192. Minutes and recording of February 16, 2004 Board Meeting.
193. Minutes and recording of February 2, 2004 Board Meeting.
194. Minutes and recording of January 19, 2004 Board Meeting.
195. Minutes and recording of January 5, 2004 Board Meeting.
196. Minutes and recording of January 2, 2004 Board Meeting.
197. Minutes and recording of December 19, 2005 Board Meeting.
198. Minutes and recording of December 5, 2005 Board Meeting.
199. Minutes and recording of November 21, 2005 Board Meeting.
200. Minutes and recording of November 7, 2005 Board Meeting.
201. Minutes and recording of October 17, 2005 Board Meeting.
202. Minutes and recording of September 19, 2005 Board Meeting.
203. Minutes and recording of September 6, 2005 Board Meeting.

204. Minutes and recording of August 1, 2005 Board Meeting.
205. Minutes and recording of July 18, 2005 Board Meeting.
206. Minutes and recording of May 2, 2005 Board Meeting.
207. Minutes and recording of April 18, 2005 Board Meeting.
208. Minutes and recording of March 28, 2005 Board Meeting.
209. Minutes and recording of March 21, 2005 Board Meeting.
210. Minutes and recording of March 7, 2005 Board Meeting.
211. Minutes and recording of February 22, 2005 Board Meeting.
212. Minutes and recording of January 17, 2005 Board Meeting.
213. Minutes and recording of January 3, 2005 Board Meeting.
214. Minutes and recording of December 18, 2006 Board Meeting.
215. Minutes and recording of December 4, 2006 Board Meeting.
216. Minutes and recording of November 20, 2006 Board Meeting.
217. Minutes and recording of November 6, 2006 Board Meeting.
218. Minutes and recording of October 16, 2006 Board Meeting.
219. Minutes and recording of September 18, 2006 Board Meeting.
220. Minutes and recording of August 21, 2006 Board Meeting.
221. Minutes and recording of August 7, 2006 Board Meeting.
222. Minutes and recording of July 17, 2006 Board Meeting.
223. Minutes and recording of July 3, 2006 Board Meeting.
224. Minutes and recording of July 19, 2006 Board Meeting.
225. Minutes and recording of June 5, 2006 Board Meeting.
226. Minutes and recording of May 15, 2006 Board Meeting.

227. Minutes and recording of May 1, 2006 Board Meeting.
228. Minutes and recording of April 3, 2006 Board Meeting.
229. Minutes and recording of March 20, 2006 Board Meeting.
230. Minutes and recording of March 6, 2006 Board Meeting.
231. Minutes and recording of February 20, 2006 Board Meeting.
232. Minutes and recording of February 6, 2006 Board Meeting.
233. Minutes and recording of January 16, 2006 Board Meeting.
234. Minutes and recording of January 3, 2006 Board Meeting.
235. Minutes and recording of December 20, 2004 Board Meeting.
236. Minutes and recording of December 6, 2004 Board Meeting.
237. Minutes and recording of November 1, 2004 Board Meeting.
238. Minutes and recording of October 18, 2004 Board Meeting.
239. Minutes and recording of October 4, 2004 Board Meeting.
240. Minutes and recording of March 29, 2004 Board Meeting.
241. Minutes and recording of October 3, 2005 Board Meeting.
242. Minutes and recording of August 15, 2005 Board Meeting.
243. Minutes and recording of June 20, 2005 Board Meeting.
244. Minutes and recording of June 6, 2005 Board Meeting.
245. Minutes and recording of May 16, 2005 Board Meeting.
246. Minutes and recording of April 4, 2005 Board Meeting.
247. Minutes and recording of October 2, 2006 Board Meeting.
248. Minutes and recording of April 17, 2006 Board Meeting.
249. Minutes and recording of January 2, 2007 Board Meeting.

250. Minutes and recording of January 15, 2007 Board Meeting.
251. Minutes and recording of February 5, 2007 Board Meeting.
252. Minutes and recording of February 19, 2007 Board Meeting.
253. Minutes and recordings of March 5, 2007 Board Meeting.
254. Minutes and recordings of March 19, 2007 Board Meeting.
255. Minutes and recordings of April 2, 2007 Board Meeting.
256. Minutes and recordings of April 16, 2007 Board Meeting.
257. Minutes and recordings of June 4, 2007 Board Meeting.
258. Minutes and recordings of July 2, 2007 Board Meeting.
259. Minutes and recordings of July 16, 2007 Board Meeting.
260. Minutes and recordings of August 6, 2007 Board Meeting.
261. Minutes and recordings of August 20, 2007 Board Meeting.
262. Minutes and recordings of September 4, 2007 Board Meeting.
263. Minutes and recordings of September 17, 2007 Board Meeting.
264. Minutes and recordings of October 1, 2007 Board Meeting.
265. Minutes and recordings of October 15, 2007 Board Meeting.
266. Minutes and recordings of November 5, 2007 Board Meeting.
267. Minutes and recordings of November 19, 2007 Board Meeting.
268. Minutes and recordings of December 17, 2007 Board Meeting.
269. Minutes and recordings of January 2, 2008 Board Meeting.
270. Minutes and recordings of January 7, 2008 Board Meeting.
271. Minutes and recordings of February 4, 2008 Board Meeting.
272. Minutes and recordings of February 18, 2008 Board Meeting.

273. Minutes and recordings of March 3, 2008 Board Meeting.
274. Minutes and recordings of March 17, 2008 Board Meeting.
275. Minutes and recordings of April 7, 2008 Board Meeting.
276. Minutes and recordings of April 21, 2008 Board Meeting.
277. Minutes and recordings of May 19, 2008 Board Meeting.
278. Minutes and recordings of June 2, 2008 Board Meeting.
279. Minutes and recordings of June 16, 2008 Board Meeting.
280. Minutes and recordings of July 7, 2008 Board Meeting.
281. Minutes and recordings of July 21, 2008 Board Meeting.
282. Minutes and recordings of September 2, 2008 Board Meeting.
283. Minutes and recordings of September 15, 2008 Board Meeting.
284. Minutes and recordings of October 6, 2008 Board Meeting.
285. Minutes and recordings of October 20, 2008 Board Meeting.
286. Minutes and recordings of November 3, 2008 Board Meeting.
287. Minutes and recordings of November 17, 2008 Board Meeting.
288. Minutes and recordings of December 1, 2008 Board Meeting.
289. Minutes and recordings of December 15, 2008 Board Meeting.
290. Minutes and recordings of March 27, 2007 Board Meeting.
291. Minutes and recordings of May 7, 2007 Board Meeting.
292. Minutes and recordings of May 21, 2007 Board Meeting.
293. Minutes and recordings of June 18, 2007 Board Meeting.
294. Minutes and recordings of December 3, 2007 Board Meeting.
295. Minutes and recordings of January 21, 2007 Board Meeting.

296. Minutes and recordings of May 5, 2008 Board Meeting.
297. Minutes and recordings of August 4, 2008 Board Meeting.
298. Minutes and recordings of August 18, 2008 Board Meeting.
299. Minutes and recordings of the Board Workshop January 28, 2005.
300. Minutes and recordings of the Board Workshop May 23, 2005.
301. Minutes and recordings of the Board Workshop October 30, 2006.
302. Minutes and recordings of the Board Workshop November 27, 2006.
303. Minutes and recordings of the Board Workshop December 11, 2006.
304. Minutes and recordings of the Board Workshop December 27, 2006.
305. Minutes and recordings of the Board Workshop January 22, 2007.
306. Minutes and recordings of the Board Workshop February 12, 2007.
307. Minutes and recordings of the Board Workshop February 26, 2007.
308. Minutes and recordings of the Board Workshop March 12, 2007.
309. Minutes and recordings of the Board Workshop March 26, 2007.
310. Minutes and recordings of the Board Workshop April 9, 2007.
311. Minutes and recordings of the Board Workshop May 14, 2007.
312. Minutes and recordings of the Board Workshop June 25, 2007.
313. Minutes and recordings of the Board Workshop July 9, 2007.
314. Minutes and recordings of the Board Workshop July 23, 2007.
315. Minutes and recordings of the Board Workshop August 13, 2007.
316. Minutes and recordings of the Board Workshop September 10, 2007.
317. Minutes and recordings of the Board Workshop October 8, 2007.
318. Minutes and recordings of the Board Workshop October 22, 2007.

319. Minutes and recordings of the Board Workshop November 12, 2007.
320. Minutes and recordings of the Board Workshop January 14, 2008.
321. Minutes and recordings of the Board Workshop January 28, 2008.
322. Minutes and recordings of the Board Workshop February 11, 2008.
323. Minutes and recordings of the Board Workshop February 25, 2008.
324. Minutes and recordings of the Board Workshop February 29, 2008
325. Minutes and recordings of the Board Workshop March 10, 2008.
326. Minutes and recordings of the Board Workshop March 24, 2008.
327. Minutes and recordings of the Board Workshop March 31, 2008.
328. Minutes and recordings of the Board Workshop April 14, 2008.
329. Minutes and recordings of the Board Workshop May 12, 2008.
330. Minutes and recordings of the Board Workshop May 27, 2008.
331. Minutes and recordings of the Board Workshop June 9, 2008
332. Minutes and recordings of the Board Workshop June 23, 2008.
333. Minutes and recordings of the Board Workshop July 14, 2008.
334. Minutes and recordings of the Board Workshop August 11, 2008.
335. Minutes and recordings of the Board Workshop August 25, 2008.
336. Minutes and recordings of the Board Workshop September 8, 2008.
337. Minutes and recordings of the Board Workshop November 10, 2008.
338. Minutes and recordings of the Board Workshop December 8, 2008.
339. Any and all minutes and documents of the Trailer Estates marina committee.
340. Any and all minutes and documents of the Trailer Estates future planning committee.
341. Any and all minutes and documents of the Trailer Estates ARC committee.

342. Any and all minutes and documents of the Trailer Estates beautification committee.
343. Any and all minutes and documents of the Trailer Estates deed restriction committee.
344. Any and all minutes and documents of the Trailer Estates budget committee.
345. Any and all minutes and documents of the Trailer Estates lease committee.
346. Any and all minutes and documents of the Trailer Estates policy and procedure committee.
347. Any and all minutes and documents of the Trailer Estates website committee.
348. Trailer Estates Board Meeting minutes for November 18, 2002.
349. Letter of March 28, 2007 from Scott Rudacille to Sharon Denson.
350. Letter of August 15, 2006 from Wayne Hamblen to Sharon Denson.
351. Statement from Trailer Estates dated July 25, 2006 to Mr. and Mrs. Denson.
352. Rules/Lease Trailer Estates Park and Recreation District Vehicle, Boat & Trailer Storage Space with address of lessor 6309 Porter Avenue East, Lansing, MI 48823.
353. E-mail from TJ Miller to Sharon Denson dated August 5, 2008.
354. Request for Copies of Trailer Estates Documents from January 1, 2005 to the present.
355. Trailer Estates Notice of Deed Restriction #7 dated August 8, 2006 to Mr. and Mrs. Smith.
356. Letter dated August 15, 2006 from Wayne Hamblen to Sharon Denson.
357. Trailer Estates Request to Review District Documents from January 1, 2005 to the present.
358. Public Records District Office Request Forms from January 1, 2008 to the present.
359. E-mail dated March 11, 2008 from Mary Lou Smith to TJ Miller with notations from TJ Miller.
360. Letter November 24, 2008 from Sharon Denson to TJ Miller with notations.
361. Hand written public records request date stamped February 9, 2009 reflecting message left by Dan Smith.

362. Trailer Estates office note by TJ Miller October 4, 2007 regarding response to public records request made by Sharon Denson in letter September 18, 2007.
363. Trailer Estates office note September 24, 2007 regarding public records request of Mary Lou Smith by e-mail reflecting document pickup October 4, 2007.
364. Memo from Janet Jones to Sharon Denson February 6, 2008 regarding request for Tribune rules.
365. March 12, 2007 letter from Mark Barnebey to Sharon Denson regarding letter of March 10, 2008.
366. Trailer Estates Park & Recreation District Violations worksheets for 2006.
367. All documents or items not yet produced through discovery.
368. All documents listed on all exhibit lists of all parties.
369. All documents necessary for impeachment or rebuttal.
370. All depositions (including video) and all deposition exhibits in this matter.
371. Any and all documents produced pursuant to Public Records Requests.
372. Any and all documents produced by each of the Defendants in response to Plaintiffs' discovery requests.

Discovery is ongoing; therefore Defendant reserves the right to supplement this exhibit list.

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been sent by Facsimile and U.S. Mail to Kevin S. Hennessy, Esquire, Lewis, Longman & Walker, P.A., 1001 Third Avenue West, Suite 670, Bradenton, Florida 34205, Attorney for Plaintiffs; Robert E. Turffs, P.A., 1444 First Street, Suite B, Sarasota, Florida 34236, Attorney for Defendant, Joseph Salerno; James D. Dye, Esquire, Dye Deitrich, Petruff & St. Paul, P.L., 1111 3rd Avenue W.,

Bradenton, FL 34205-7834, Attorney for Defendant, Mary Lou McNulty; Hunter W. Carroll, Esquire, Matthews, Eastmoore, et al., 1777 Main Street, Suite 500, Sarasota, FL 34236, Attorney for Defendant, Janet Jones; Daniel E. Scott, Esquire, Daniel E. Scott, P.A., 2033 Main Street, Suite 408, Sarasota, FL 34237, Attorney for Defendant, John Vander Molen, on this 10<sup>th</sup> day of August, 2009.

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